



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

October 14, 1998

RE: DOE FEMP
NEPA EA FOR FINAL LAND USE
AT FERNALD

Mr. Gary Stegner
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Stegner:

Ohio EPA has reviewed DOE's September 18, 1998 document "Environmental Assessment for Proposed Final Land Use at the Fernald Environmental Management Project." The following paragraphs provide our comments on the document.

Ohio EPA supports the Proposed Action's commitment of the majority of the Fernald site to natural resource restoration. We believe this is the most logical and efficient use of the post-remediation landscape. In addition, we expect that this commitment of the site will lead to the successful negotiation of a resolution for the State of Ohio's NRDA claim against DOE.

The restored site should provide an opportunity for education and recreation for residents of the local community as well as the tri-state area. Development of educational and recreational features into the restored site along with the involvement of local schools and universities in the restoration will yield substantial benefits to DOE and the community.

Ohio EPA believes DOE should more pro-actively support the concept and implementation of a Native American memorial/reburial area on the Fernald site. Ohio EPA is eager to work with the Natural Resource Trustees, DOE, tribal government, local community and others to make this idea a reality. Incorporation of this concept into the natural resource restoration is certainly feasible.

With regard to setting aside the 23 acres for potential economic reuse, Ohio EPA believes the evaluations conducted for the Community Reuse Organization provide considerable enlightenment to this portion of the Proposed Action. Given the lack of commercial demand for the property into the foreseeable future, Ohio EPA recommends DOE consider community based uses that are consistent with the final land use for the rest of the site. One current proposal that Ohio EPA believes has merit is the development of a museum/educational facility on the 23

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acres. Such a facility could house information developed by the Fernald Living History Project, an environmental education center leading to the rest of the site and educational facilities regarding Native American culture and reburials. A facility of this type would provide educational resources for local schools and draw visitors who would support local businesses.

A final issue that needs to be considered regarding the language setting aside the 23 acres is the likelihood that OSDF construction will require clay borrow from that area. The area west of the south entrance road was evaluated as a backup borrow area in the original OSDF design. Considering the current rate of clay usage and screening efficiency, Ohio EPA believes it is likely that borrow activities will have to occur within the 23 acres addressed in the EA. Therefore, whatever decisions result from this public comment period it is in DOE's best interest to maintain the option of using this area for borrow activities.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

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